

12405

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

CHRISTIAN DAIGRE,

Plaintiff,

v.

MEL DAVIS, Chief of Police of the  
Village of Robbins, in his individual  
and official capacities, TYRONE WARD,  
Mayor of the Village of Robbins, in his  
individual and official capacities, JAMES E.  
COFFEY, SR., Village of Robbins Trustee,  
in his individual and official capacities,  
DAVID BRYANT, Village of Robbins  
Trustee, in his individual and official  
capacities, ILA DAVIS, Village of Robbins  
Trustee, in her individual and official  
capacities, LEMMY JOHNSON, Village of  
Robbins Trustee, in his individual and  
official capacities, SHANTIEL SIMON,  
Village of Robbins Trustee, in his  
individual and official capacities, and  
CHANEL KELLY, Village of Robbins  
Trustee, in her individual and official  
capacities, ERNESTINE BECK-FULGHAM  
Village Administrator, in her individual and  
official capacities, and the VILLAGE OF  
ROBBINS, ILLINOIS,

Defendants.

Case No.: 14 CV 1980

Judge: Elaine Bucklo

Magistrate Judge Finnegan

JURY TRIAL DEMANDED

CONFIDENTIAL

AFFIDAVIT OF CHRISTIAN DAIGRE

I, Christian Daigre, do depose, state and attest to the following facts which are  
within my personal knowledge:

1. I am the Plaintiff in the above-referenced litigation.
2. With respect to the following corporate entities:



- a) SDG Investigations, Inc.;
- b) SDG Solutions, Inc.;
- c) SDG Global, Inc. Indiana; and
- d) SDG Investigations, Inc. Indiana,

I was the President of SDG Investigations, Inc. in 2012.

3. In 2013 and 2014, I was not the President of SDG Investigations, Inc., nor was I the CEO or owner of that corporation.

4. In 2012-2014, I was not the President, CEO or owner of SDG Solutions, Inc. I had no corporate involvement with this organization as evidenced by the K-1 statements from my personal tax returns for these tax years that were previously produced to the Defendants in discovery.

5. SDG Global, Inc. – Indiana is not a separate corporate entity for purposes of filing federal tax returns as SDG Global, Inc. and SDG Global, Inc. – Indiana have the same federal employer identification number (“FEIN”) of 27-4554722. I previously produced to the Defendants the federal tax returns for SDG Global, Inc. for 2012-2014.

6. The corporation name of “SDG Global, Inc. – Indiana” was created to obtain the required license from the State of Indiana and allow SDG Global, Inc. to legally operate its business of conducting security and investigative work in the State of Indiana.

7. SDG Investigations, Inc. – Indiana is not a separate corporate entity for purposes of filing federal tax returns as SDG Investigations, Inc. and SDG Investigations, Inc. – Indiana have the same federal employer identification number (“FEIN”) of 20-5329426. I have produced to the Defendants the federal tax returns for SDG

Investigations, Inc. for 2012, the only year in which I was President, CEO and/or corporate owner of SDG Investigations, Inc.

8. The corporation name of "SDG Investigations, Inc. – Indiana" was created to obtain the required license from the State of Indiana and allow SDG Investigations, Inc. to legally operate its business of conducting security and investigative work in the State of Indiana.

I, Christian Daigre, declare under penalty of perjury and the other penalties imposed by 28 U.S.C. § 1746 that the foregoing is true and correct.



Dated: July 22, 2016

